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OCT 26 1999

EIS000207

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**International Brotherhood of Electrical Workers at
U.S. Department of Energy Hearing Comments Regarding**

Yucca Mountain Draft Environmental Impact Statement

Washington, D.C.

October 26, 1999

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Good Afternoon. My name is James Dushaw, and I am Utility Department Director at the International Brotherhood of Electrical Workers.

The IBEW appreciates the opportunity to present comments at this hearing. We strongly believe that safe nuclear energy is plainly vital to our country's energy mix, and that without a repository for storing used nuclear fuel, we run the risk of losing a needed energy source.

2 The nearly 750,000 members of the IBEW include many workers at nuclear facilities. Overall, over 70,000 union employees work in long-term, good-paying jobs at the 103 operating nuclear power plants. Without a proper storage facility for their used nuclear fuel, these nuclear plants face the possibility of having to shut down.

If plants start closing down due to a lack of spent fuel storage space, many union jobs will disappear, and consumers, for no compelling reason, lose a real contender for lower-cost electricity in the newly competitive electric supply industry.

In addition to the 70,000 permanent jobs, thousands of additional union employees are hired during each refueling outage at the plants around the country. In order for these jobs to continue, it is obviously necessary for the nuclear plants to continue operating. If even one plant is forced to shut down because of a lack of storage space, hundreds, possibly thousands, of jobs will be irretrievably lost.

3 It's clear this nation needs to have a place to put the used nuclear fuel to ensure continued operation of our nuclear power plants. Scientists have been studying Yucca Mountain for more than a decade. This mountain is the most extensively defined piece of property in the world. DOE's viability assessment, which was released last year, shows that based upon the scientific studies of Yucca Mountain, thus far, there are no "showstoppers" to continuing forward with the environmental impact statement process.

4 It clearly makes sense that we should store the used nuclear fuel at one centralized storage facility. Fuel is currently stored at more than 150 long-term storage facilities in 41 states. According to the draft EIS, there is significantly more protection for the American public and the environment if we have one central federal repository. We should not pass this problem onto our children and grandchildren, especially since science has proven that we can safely transport and store the fuel at Yucca Mountain.

5 It is a fact that the spent nuclear fuel being transported today is done so safely. We have already had over 3000 shipments of used nuclear fuel in our country. Out of these 3000 shipments, only 8 accidents have occurred, and no

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injuries or fatalities have occurred as a result of radiation leaks from the transportation containers. Our existing laws and regulations provide for the safe loading, packaging, transportation and unloading of all kinds of nuclear materials today. It has been proven that this type of cargo can be moved with the utmost safety. There is no reason to believe that the continued transportation of radioactive materials will be any less safe. Union workers are justifiably proud of their safety record in transporting radioactive cargo. |

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| The federal government has a legal obligation to manage and dispose of the used fuel created by the nation's electric utilities. For seventeen years, consumers of electricity, including union workers, have paid more than \$16 billion into a federal trust fund to pay for the disposal of used nuclear fuel. Only about six billion of these dollars have been spent on the Yucca Mountain project. Utility customers have paid this money to ensure that the government lives up to its responsibility and begins managing the used nuclear fuel. |

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| The Draft Environmental Impact Statement, with its extensive scientific studies, shows that Yucca Mountain is a suitable repository for the used nuclear fuel. In addition, historically we have proven that we can safely transport radioactive cargoes without harming American citizens or the environment. We must protect the many union jobs that depend upon the continued operation of our nuclear power plants. It just makes sense that we continue forward with Yucca Mountain as the repository for our nation's used nuclear fuel. Many union jobs are at stake. |

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